

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
EARL ROBINSON,	:	VIOLATIONS:
a/k/a "Squirrel"	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute more than 50 grams of
	:	cocaine base ("crack") - 1 count)
	:	21 U.S.C. §§ 860 & 841(a)(1) (possession
	:	with intent to distribute more than 50
	:	grams of cocaine base ("crack") within
	:	1000 feet of a school – 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute marijuana - 1 count)
	:	21 U.S.C. §§ 860 & 841(a)(1) (possession
	:	with intent to distribute marijuana within
	:	1000 feet of a school – 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine - 1 count)
	:	21 U.S.C. §§ 860 & 841(a)(1) (possession
	:	with intent to distribute cocaine within
	:	1000 feet of a school – 1 count)
	:	21 U.S.C. § 841(a)(1) (distribution of
	:	cocaine base ("crack") - 3 counts)
	:	21 U.S.C. §§ 860 & 841(a)(1) (distribution
	:	of cocaine base ("crack") within 1000 feet
	:	of a school – 3 counts)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime - 1 count)
	:	Notice of additional factors
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally possessed with intent to distribute more than 50 grams, that is,
approximately 55 grams, of a mixture or substance containing a detectable amount of cocaine
base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally possessed with intent to distribute more than 50 grams, that is, approximately 55 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1000 feet of the real property comprising a private elementary school, that is, the Philadelphia Christian Academy, located at 4400 North Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a "Squirrel,"**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing
a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, within 1000 feet of the real property comprising a private elementary school, that is, the Philadelphia Christian Academy, located at 4400 North Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT FIVE

THE GRAND JURY CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a "Squirrel,"**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing
a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a "Squirrel,"**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising a private elementary school, that is, the Philadelphia Christian Academy, located at 4400 North Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 29, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 29, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance within 1000 feet of the real property comprising a private elementary school, that is, the Philadelphia Christian Academy, located at 4400 North Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 1, 2004, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 1, 2004, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1000 feet of the real property comprising a private elementary school, that is, the Philadelphia Christian Academy, located at 4400 North Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1000 feet of the real property comprising a private elementary school, that is, the Philadelphia Christian Academy, located at 4400 North Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EARL ROBINSON,
a/k/a "Squirrel,"**

knowingly possessed a firearm, that is, a Colt Trooper .357 Magnum CTG, serial #81941L, loaded with 5 live rounds, a Colt Cobra .38 Special CTG, serial # 48035, loaded with 6 live rounds, and a Colt AR-15 rifle, model SP1, Serial #SP52865, .223 caliber, and a magazine loaded with 18 live rounds, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One, Two, Three, Four, Five, Six, Eleven and Twelve of this indictment, defendant **EARL ROBINSON, a/k/a “Squirrel”**:

a. Committed an offense in which a dangerous weapon (including a firearm) was possessed, as described in U.S.S.G. § 2D1.1(b)(1).

2. In committing the offense charged in Count Thirteen of this indictment, defendant **EARL ROBINSON, a/k/a “Squirrel”**:

a. Committed an offense involving 3 firearms, as described in U.S.S.G. § 2K2.1(b)(1).

b. Used and possessed any firearm and ammunition in connection with another felony offense, as described in U.S.S.G. § 2K2.1(b)(5).

3. In committing the offenses charged in Counts One and Two of this indictment, defendant **EARL ROBINSON, a/k/a “Squirrel”**:

a. Committed an offense involving at least 50 grams of cocaine base (“crack”) but less than 150 grams of cocaine base (“crack”), as described in U.S.S.G. § 2D1.1(a)(4).

4. In committing the offenses charged in Counts Three and Four of this indictment, defendant **EARL ROBINSON, a/k/a “Squirrel”**:

a. Committed an offense involving less than 250 grams of marijuana, as described in U.S.S.G. § 2D1.1(a)(4).

5. In committing the offenses charged in Counts Five and Six of this indictment, defendant **EARL ROBINSON, a/k/a “Squirrel”**:

a. Committed an offense involving at least 200 grams of cocaine but less than 300 grams of cocaine, as described in U.S.S.G. § 2D1.1(a)(4).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c)(1), as set forth in this Indictment, defendant

**EARL ROBINSON,
a/k/a “Squirrel,”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearms and ammunition involved in the commission of this offense, including, but not limited to:

1. a Colt Trooper .357 Magnum CTG, serial #81941L, loaded with 5 live rounds;
2. a Colt Cobra .38 Special CTG, serial # 48035, loaded with 6 live rounds;
3. a Colt AR-15 rifle, model SP1, Serial #SP52865, .223 caliber, and a magazine loaded with 18 live rounds.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN

UNITED STATES ATTORNEY